

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE: :  
Robert A Donald : Chapter 13  
: No.: 22-13337-PMM  
Debtor(s) :  
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**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor, Robert A Donald, by and through their undersigned counsel Brad J. Sadek, hereby objects Lakeview Loan Servicing, LLC's, Certification of Default on the following basis:

It is Denied that Debtor/Borrower, Robert A Donald, is delinquent on the July 25th, 2023, stipulation. By way of further answer, Debtor/Borrower made a recent payment to satisfy the lender's Notice of Default. If the Debtor/Borrower is delinquent, he shall be current prior to the hearing on the lender's instant Certification of Default.

WHEREFORE, Debtors respectfully requests this Honorable Court to DENY Movant's Order requesting Relief from the Automatic Stay.

Dated: August 5, 2024

/s/ Brad J. Sadek, Esq.

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